

Ms. Heather L. Kennedy
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Attorney for: Public School System

IN THE UNITED STATES DISTRICT COURT
OF THE NORTHERN MARIANA ISLANDS

LISA BLACK,

Plaintiff,

vs.

**JIM BREWER, CNMI Public School
System and JOHN AND/OR JANE DOE,**

Defendants.

) Civil Case No. 05-0038

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)

)Declaration of Karen M. Klaver In Support of
) Defendant Public School System's
) Response to Plaintiff's Motion to Compel

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DECLARATION OF KAREN M. KLAVER

I, Karen M. Klaver, declare under penalty of perjury that the following information is true and accurate:

1. I am a licensed attorney in the Commonwealth of the Northern Marianas Islands and have been working as Legal Counsel for the Public School System since March of 2003.
2. I am familiar with the document production in the current case and the general recordkeeping of PSS.
3. PSS produced documents to Plaintiff as they are kept in the usual course of business. PSS copied, bates stamped and produced 1915 pages of documents to Plaintiff to date.

- 1 4. On April 20, 2006, PSS produced 808 pages of documents in response to Plaintiff's First
- 2 Set of Production Requests.
- 3 5. In accordance with a protective order and agreement with Plaintiff, PSS later produced
- 4 652 pages of documents containing information from personnel files and employee and
- 5 applicant data as specifically requested by Plaintiff.
- 6 6. On May 15, 2006, PSS provided detailed responses to Plaintiff's First Set of
- 7 Interrogatories. Plaintiff's Interrogatories did not request that PSS identify any
- 8 documents and PSS did not provide responses to the Interrogatories that referenced any
- 9 documents.
- 10 7. Copies of procedures, policies and regulations as requested by Plaintiff in its First Set of
- 11 Production Requests were produced and may be found in pages bates stamped 652-808.
- 12 8. Copies of documents maintained in personnel files of employees are found together in the
- 13 order in which they are maintained by PSS. Pages 1-166, 809-1339, 1605-1670 are
- 14 copies of documents from the personnel files of 4 individuals as the documents are
- 15 maintained by the PSS Human Resources Office.
- 16 9. In response to Plaintiff's Second Set of Production Request, PSS produced documents
- 17 from a personnel file specifically requested by Plaintiff and notes, memos, bulletins and
- 18 documents maintained by the Hopwood Junior High School and the Board of Education
- 19 specifically relating to Lisa Black's performance and her grievance against Mr. Brewer.
- 20 10. Attached as Exhibit A is a true and accurate copy of the letter from Heather Kennedy to
- 21 George Hasselback dated July 13, 2006 regarding this discovery dispute.
- 22 11. Attached as Exhibit B is a true and accurate copy of the Plaintiff's 30(b)(6) deposition
- 23 notice to PSS.

24 Signed this _____ day of July, 2006 on the island of Saipan in the Commonwealth of the
25 Northern Mariana Islands by:



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27 Karen M. Klaver
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